

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

CASE NO. 06-02676 ESL

SANDRA LISSETTE MEDINA GONZALEZ
Debtor(s)

CHAPTER 13



MOTION REQUESTING FINAL HEARING

TO THE HONORABLE COURT:

NOW COMES secured creditor, **DORAL BANK**, by the undersigned attorney, and very respectfully ALLEGES AND PRAYS:

1. On August 25th, 2011, Doral Bank filed a motion for relief from stay for debtors failure to keep post-petition payments, specifically November 2009, April 2010, July 2010, April 2011 and July 2011.

2. On September 7, 2011, debtor filed a reply to our Motion for Relief from Stay alleging that she was current and presenting evidence of the payment made in 2011. On September 6, 2011, debtor made **Two** payments out of **Five** payments claimed in the 362 motion for relief. No other evidence was presented by the debtors for the prior years.

3. A preliminary hearing on said motion was scheduled for tomorrow September 20th, 2011.

4. The undersigned attorney respectfully requests that the hearing on motion for relief from stay be rescheduled to allow debtor to provide evidence of the payments allegedly made to Doral Bank and the undersigned attorney be excused from appearing since we have a doctor's appointment scheduled for tomorrow at 10:00 a.m. in Ponce and there is no one that can substitute for us.

WHEREFORE it is respectfully requested from this Honorable Court to takes notice of all of the above, grant this motion and grant any other remedy that deems just and proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this same date I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF System which will send notification of such filing to: Mr. Jose R. Carrión- Chapter 13 Trustee and to the attorney for the debtors.

In San Juan, Puerto Rico this 19th day of September, 2011.

/s/ Ligia Rivera Bujosa
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